

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA**

IN RE: : CHAPTER 13  
Gary A. Lunn and :  
Sharon L. Lunn, : Case No: 5:15-bk-02167RNO  
Debtors. :

.....  
**MOTION FOR TERMINATION OF WAGE ATTACHMENT**

Comes now, Gary A. Lunn and Sharon L. Lunn, his wife, by and through Richard A. Wilson, Esquire and respectfully represents in support thereof:

1. Debtors filed for a Chapter 13 bankruptcy on May 21, 2015.
2. Plan was confirmed on December 28, 2015.
3. A Motion for Wage Attachment was filed on June 19, 2015.
4. The Order Granting Wage Attachment was dated June 23, 2015.
5. All plan payments have been paid.
6. The bankruptcy is now complete.
7. Debtors wish to terminate the wage attachment

WHEREFORE, the Debtors respectfully request that this Court enter an order directing the above mentioned wage attachment be terminated.

Respectfully Submitted,

/s/ Richard A. Wilson, Esq.  
Attorney for Debtors  
PA Bar ID: 81508  
P.O. Box 742  
Wyalusing, PA 18853  
(570) 746-3480

**DEBTOR CONSENT TO TERMINATION OF WAGE**  
**ATTACHMENT**

April 8, 2020

/s/ Gary A. Lunn

Debtor – Gary A. Lunn

April 8, 2020

/s/ Sharon L. Lunn

Debtor – Sharon L. Lunn

## **CERTIFICATE OF SERVICE**

AND NOW, this 8<sup>th</sup> day of April, 2020, I hereby certify that I have served the within Motion by depositing a true and correct copy of the same in the United States Mail at Towanda, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

/s/ Richard A. Wilson, Esq.  
Richard A. Wilson, Esq.  
Attorney for Debtors

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2020, the Court  
has considered the Motion to Terminate Wage Attachment was filed on  
\_\_\_\_\_, 2020, and

IT IS ORDERED THAT:

The Debtor's employer, Cargill Meat Solutions Corp., ATTN: Payroll  
Department, P.O. Box 5610 Minneapolis, MN 55440, will TERMINATE the  
transmission to the Chapter 13 Trustee as previously ordered on April 10, 2015.

\_\_\_\_\_  
Judge Robert N. Opel J.